

# Mixed-Income Rental Housing

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# Guest Presenter

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**Poll: Who's  
attending  
today?**

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Local Government

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Nonprofit Developer

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For Profit Developer

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Financial Institution

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Other

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# Agenda

- Defining Mixed-Income, Advantages and Challenges
- Tools and Resources for Producing Mixed-Income
  - Land Use Tools
  - Financial Resources
- Program Administration and Compliance-Alfredo Duran, City of Miami



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# Defining Mixed Income Rental Housing

# Defining Mixed Income Housing

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Residents with a range of incomes where they do not “see” the incomes of their neighbors; instead, they recognize that they live in a mixed-income area through more visible social categories that are correlated with income, such as housing type (homeowner, renter, or subsidized renter), length of residence, and race/ethnicity. (HUD.gov)

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Deliberate effort to construct and/or own a multifamily development that has the mixing of income groups as a fundamental part of its financial and operational plans. (Urban.org)

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All intentional efforts to generate socioeconomic diversity in a targeted geographic area (Briggs et al. 2009).

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# The Importance of Mixed Income Housing

- Alternative to traditional subsidized-housing initiatives for low-income persons.
- Mixed-income housing communities are developments that comprise differing levels of affordability.
  - Some units at market rate and others available to low-income households at below-market rates.
- Intended to provide good housing for people with diverse income classifications.

# The Importance of Mixed Income Housing

- HUD recognizes that mixed-income housing raises the standard of living for low-income residents and that it increases property values, stabilizes and diversifies communities, and results in a better quality of homes and services.
- Contributes to alleviating poverty.
- Lower rents help renters save to buy a market-rate, single-family home in their same community.
- Mixed-income housing aims to, among other things, improve low-income residents' access to public amenities and infrastructure.
- Improves the financial sustainability of a development while serving lowest income bands.

# Advantages to Mixed Income Housing

- Financial feasibility throughout development process and stabilization/operations.
  - "Anchors" rents
- Integrates households with various income levels, providing opportunity that otherwise would not be available.
- Decreasing concentrations of poverty.
- Increases a community's acceptance of affordable housing.

# Challenges to Mixed Income Housing

- Can be difficult to finance
  - Differing regulations based on funding source
  - Sources often favor “all affordable” or “all market-rate”
  - Multiple processes for accessing funding and incentives
- Ongoing compliance
  - Property management may need training to understand income guidelines and verification/certification process
  - Local government staff may need increased capacity to monitor growing number of developments with restricted units





# **Tools for Producing Mixed Income Rental Housing**

# Land Use Tools

- Incentives
- Inclusionary Zoning
- HB 1339



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# Development Incentives for Affordable Housing

Favorable Development Rights (Incentives)	Public Benefits – Affordable Housing
Flexible housing types & uses	On-site affordable housing development
Density Bonus	Off-site affordable housing development
Height Increase	Fee towards an affordable housing trust fund
Parking Requirement Relief	Land dedication to a housing nonprofit
Relaxation of Design Standards	
Expedited Permitting & Building Inspections	
Fee waivers	
Infrastructure Contributions	
Offering publicly-owned land below-market	



# Two Types of Inclusionary Zoning (IZ)

- **Mandatory inclusionary zoning** is a land use mechanism that requires a market-rate developer to provide a set number or percentage of affordable units within a market-rate development
- **Voluntary inclusionary zoning** encourages the private sector to provide affordable housing in exchange for favorable development rights (incentives)

# Importance of Mandatory IZ

As of 2016:

- Nationally, approximately **174,000 affordable homes** have been produced with IZ ordinances. This number does not include the additional units created with the **\$1.7 billion collected from in-lieu fees**.
- 443 jurisdictions report **49,277** affordable **homeownership** units
- 581 jurisdictions report **122,320** affordable **rental** units
- Example: In Palm Beach County – more than **2,500 IZ units produced**

# IZ: Common Characteristics

- **Threshold number of market rate units** that activates the IZ requirement w/a corresponding percentage of affordable units required
- Requirement that affordable units are **comparable in quality and aesthetics** to market rate units
- **Benefits or incentives** to assist the private sector in providing the affordable units



# IZ: Common Characteristics

- Multiple options for compliance including **land in-lieu** for others to produce the affordable units and **payment in-lieu** where nature of development makes it practically infeasible to include affordable units
- Housing trust fund as **the depository for the payments in-lieu**
- **Term of affordability**
- Policies for **administration** of the program and opportunity for appeal

# House Bill 7103 (2019)

- Amended Florida's inclusionary zoning laws – found at ss. 125.01055 (counties) and 166.04151 (municipalities)
- For mandatory inclusionary zoning, local governments must now “provide incentives to fully offset all costs to the developer of its affordable housing contribution”
- Ex) if there is a 100-unit market-rate development and 10 of the units are required to be affordable, local government must provide incentives to “fully offset all costs” associated with the 10 affordable units

# Mandatory IZ v. Incentive Zoning

Mandatory IZ	Incentive Zoning
<u>Requires</u> a market-rate developer to provide affordable housing	<u>Encourages</u> the private sector to produce affordable housing through a set of favorable development rights, or incentives
Local government must “fully offset all costs” to the developer for its affordable housing contribution under HB 7103	HB 7103 cost offset requirements do not apply
Nearly all local governments with mandatory IZ have produced affordable units through their programs	Most productive in the form of a density bonus for developments in higher-cost or fast-growing areas
<b>Both</b> require political will, staff commitment, ability to monitor long-term affordability, & flexible policy design	

# Land Use Flexibility for Affordable Housing

- House Bill 1339 (2020), amended by Senate Bill 962 (2022), provided tremendous flexibility to local governments to approve affordable housing developments without needing a rezoning or comprehensive plan amendment.
- 2022 updates (Senate Bill 962):
  - If used in commercial or industrial zones, 1) at least 10% of the units must be affordable; and 2) developer cannot apply for SAIL funding
  - Tool is self-executing and does not require an ordinance

# Land Use Flexibility for Affordable Housing

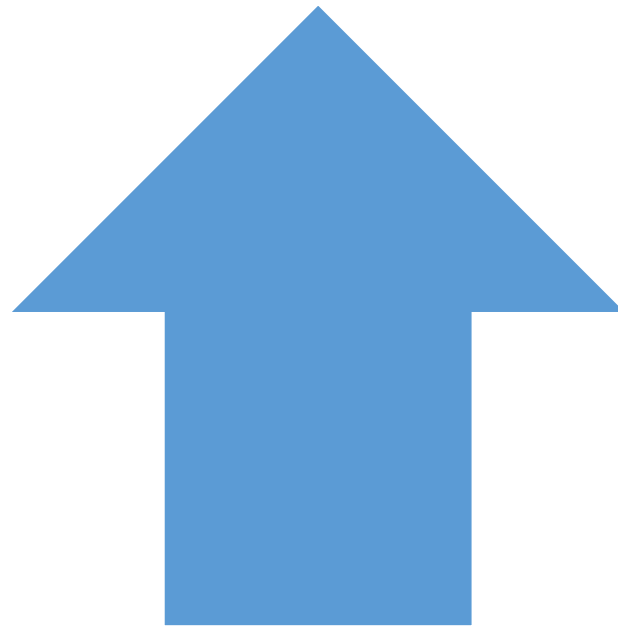
- S. 125.01055(6) for counties and S. 166.04151(6) for cities:
  - “Notwithstanding any other law or local ordinance or regulation to the contrary, the governing body of a [city or county] may approve the development of housing that is affordable, as defined in s. 420.0004, on any parcel zoned for residential, commercial, or industrial use. . .
  - . . . If a parcel is zoned for commercial or industrial use, an approval pursuant to this subsection may include any residential development project, including a mixed-use residential development project, so long as at least 10 percent of the units included in the project are for housing that is affordable and the developer of the project agrees not to apply for or receive funding under s. 420.5087. The provisions of this subsection are self-executing and do not require the governing body to adopt an ordinance or a regulation before using the approval process in this subsection.

# Application of HB 1339

- F.S. 125.01055(6) & 166.04151(6) allow local governments to expedite development approvals for affordable housing regardless of the underlying zoning standards
  - Example: An affordable housing developer could be permitted to build a multifamily project in a commercial land use designation without needing a comprehensive plan amendment or zoning change
- Can act as a “super-waiver” of land development regulations for affordable housing



# Benefits & Burdens



## Good



- Could reduce costly land use barriers for affordable housing development
- Expands government owned-lands that can be used for housing
- Expedite affordable development
- Can be helpful for missing middle housing & adaptive reuse
- Helpful in combating NIMBY



## Not So Good



- Would be harmful if misused to permit affordable housing where people should not live – e.g. near toxic uses, in food deserts, areas without adequate transit or infrastructure
- If used in commercial and industrial areas, may reduce available land for new employment/job growth

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# How to Implement F.S. §§ 125.01055(6) & 166.04151(6)

- State law does not provide a method for how to implement this land use flexibility
- Can be done through an implementing ordinance (St. Petersburg) or on a case-by-case basis at the staff level (Jacksonville)
- Although these statutes allow the waiver of all development standards, there will be development standards the local government will still need to regulate:
  - Density
  - Lot configuration requirements such as setbacks & parking
  - Concurrency
  - Compatibility with surrounding structures
  - Environmental considerations

# Localizing HB 1339

- If a local government has the **motivation** to approve a particular affordable housing development in a residential, commercial, or industrial zone, it can use § 125.01055(6) or § 166.04151(6) to do so regardless of the underlying zoning
- Use this land use flexibility to condition fast-tracked development approval on the provision of long-term affordable units
- Example:
  - A Commercial corridor that the local government wants to incentivize redevelopment as mixed-use
  - Commercial zoning allows up to 24-units per acre of residential by right
  - Utilize this provision to allow a developer to build residential at a higher density (double, triple) if affordable housing is provided

# Example: Fairfield Apartments in St. Petersburg



Lumber yard in St. Petersburg to become 264-units  
of mixed-income housing

Photo credits: [www.stpeterising.com](http://www.stpeterising.com)

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# Financial Resources

- Income Averaging for LIHTC
- Infrastructure Surtax
- Opportunity Zones





# FHFC Best Practices on Income Averaging

<https://www.floridahousing.org/programs/developers-multifamily-programs/competitive>

## Average Income Test Election Worksheet

If you wish to change your minimum set-aside election, please fill this form out and send it to [Melissa.Levy@floridahousing.org](mailto:Melissa.Levy@floridahousing.org). Upon receipt, Florida Housing will begin its review of your request. Program Staff will reach out to you with any deficiencies. Based on staff's initial review, if your Development is eligible to change its minimum set-aside election, your Underwriter will be contacted to begin the next steps.

Name of Development	
FHFC Development #	
Total Number of Units in Development	
Total Initial HC Set Aside Units	
Total Final HC Set Aside Units*	
Does the Development have SAIL ELI Funding?	
Has the ELI Loan Closed?	
If not, do you plan to keep ELI funding?	
Does the Development have Bonds?	
What are the Bond Set-Asides?	
Number of NHTF Units	
Are any of your units currently occupied?	
How many of your occupied units are Income Qualified at or below the 50% AMI level?	
Is there an existing EUA on the property?	

\*Final HC Set-Aside Units must be equal to or greater than Initial HC Set Aside Units

Please include a brief description of your proposal under the Income Averaging Election.

Please use the chart below to present your current and proposed new Housing Credit set-aside elections. The new set-aside election must average 60% or below.

	Current HC Set-Asides		Proposed HC Set-Asides	
Income Band	% of Units	Number of Units	% of Units	Number of Units
20%				
25%				
28%				
30%				
33%				
35%				
40%				
45%				
50%				
60%				
70%				
80%				
Non-HC Units				
Totals	0%	0	0%	0
Overall Avg AMI		0.00%	Overall Avg AMI 0.00%	

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# Snapshot: FHFC Requirements on Income Averaging

- Units provided additional funding through the National Housing Trust Fund (NHTF) program, which are required to be set aside for households at or below 22% AMI, may not be offset by units designated at an AMI that is greater than the AMI category applicable to NHTF.
- On Housing Credit transactions with SAIL, SAIL units must be Income Averaged along with the Housing Credit units.
- Regardless of the designated AMI category of the ELI County Chart, if Income Averaging is elected, all ELI units in a development will use the federal 30% AMI standard.

# Snapshot: Income Averaging's Impact on Set Asides

- For both 4% and 9% Housing Credit transactions, the overall AMI of the Housing Credit Set-Aside Commitment may be averaged up to 60%.
  - 9% LIHTC:
    - ELI set-aside in Family and Elderly developments will be increased to a 15% set-aside from 10%.
    - ELI set-aside for 9% Housing Credit Preservation developments will be increased to a 25% set-aside from 20%.
  - 4% LIHTC: If the ELI loan has already closed, the development may income average all of its set-aside units, which must include at least the ELI set-aside commitment from the application plus 5% for the entire 50-year affordability period.
- Workforce Housing Developments are allowed to Income Average.
  - Workforce developments that choose Income Averaging will have to increase the 5% ELI commitment to a 10% ELI commitment and the overall AMI may be averaged up to 60%.

# Approval Process

- Owned by FHFC
- Requirements of Income Averaging
- Approval of Set-Aside is Subject to Specific Conditions
- Additional Considerations

## Average Income Test

- ▶ [Florida Housing's Best Practices on Average Income Test](#)
- ▶ [Applicant Average Income Test Acknowledgement and Certification](#)
- ▶ [10-24-18 Revised Average Income Test Election worksheet](#)

<https://www.floridahousing.org/programs/developers-multifamily-programs/competitive>



# FHFC RFA Income Averaging Worksheet Examples

INCOME AVERAGING WORKSHEET

	AMI Set-Aside	# of Units	% of Units
	20%		0.00%
(ELI Designation)	30%	19	15.70%
	40%		0.00%
	50%		0.00%
	60%	30	24.79%
	70%	57	47.11%
	80%		0.00%
Total Qualifying Housing Credit Units		106	87.60%
Market Rate Units		15	12.40%
Total Units		121	100.00%
Average AMI of the Qualifying Housing Credit Units		60.00%	(equal to 60% maximum)

(This should match the HC Set-Aside Commitment in the Application)

(Total Units here matches the Total Units entered on row 33 above)

INCOME AVERAGING WORKSHEET

	AMI Set-Aside	# of Units	% of Units
	20%		0.00%
(ELI Designation)	30%	17	15.45%
	40%		0.00%
	50%		0.00%
	60%	57	51.82%
	70%		0.00%
	80%	25	22.73%
Total Qualifying Housing Credit Units		99	90.00%
Market Rate Units		11	10.00%
Total Units		110	100.00%
Average AMI of the Qualifying Housing Credit Units		59.90%	(less than 60% maximum)

(This should match the HC Set-Aside Commitment in the Application)

(Total Units here matches the Total Units entered on row 33 above)

INCOME AVERAGING WORKSHEET

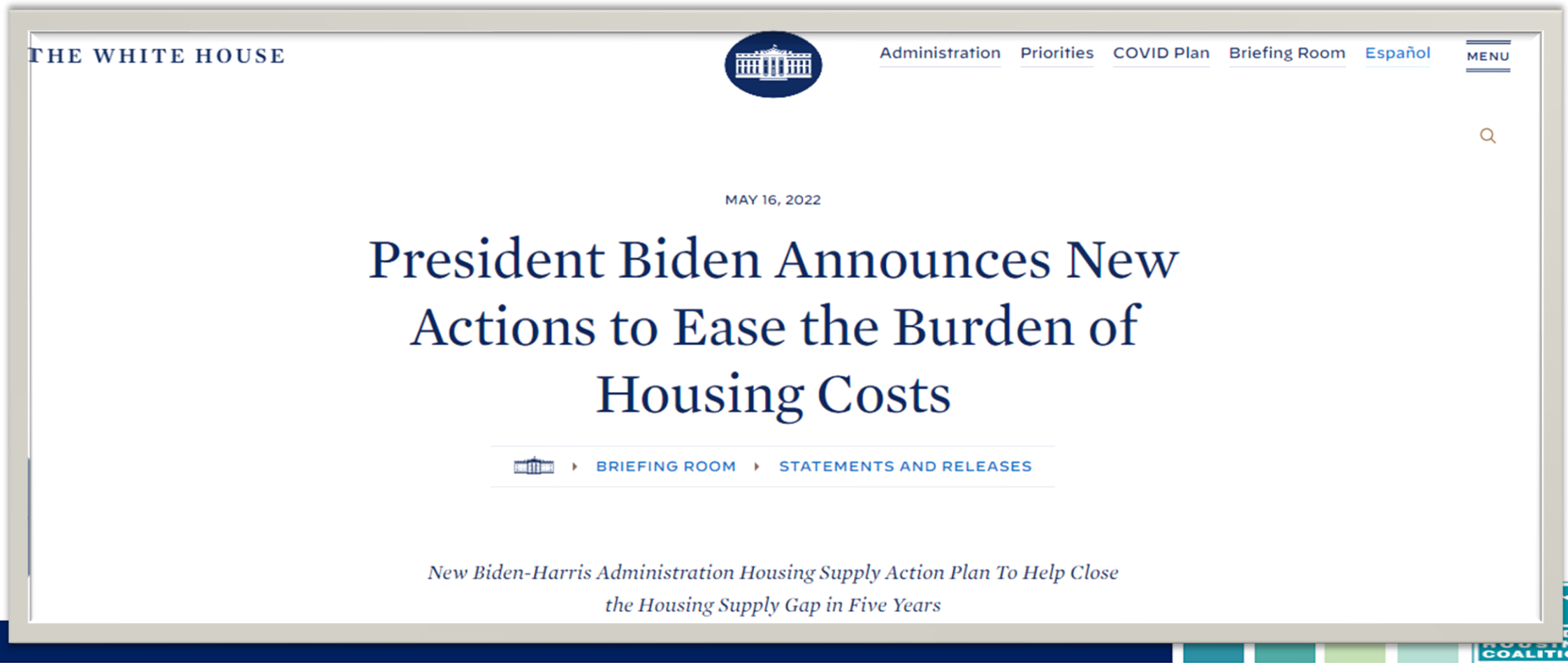
	AMI Set-Aside	# of Units	% of Units
	20%		0.00%
(ELI Designation)	30%	18	15.00%
	40%		0.00%
	50%		0.00%
	60%	48	40.00%
	70%	54	45.00%
	80%		0.00%
Total Qualifying Housing Credit Units		120	100.00%
Market Rate Units			0.00%
Total Units		120	100.00%
Average AMI of the Qualifying Housing Credit Units		60.00%	(equal to 60% maximum)

(This should match the HC Set-Aside Commitment in the Application)

(Total Units here matches the Total Units entered on row 33 above)

# Biden-Harris Administration Housing Supply Action Plan Overview

Goal is to increase housing affordability and supply by implementing five main action steps.



# Housing Supply Action Plan

- 1. Reward jurisdictions that have reformed zoning and land-use policies** with higher scores in certain federal grant processes, for the first time at scale.
- 2. Deploy new financing mechanisms to build and preserve more housing where financing gaps currently exist.**
  - Manufactured housing (including with chattel loans that the majority of manufactured housing purchasers rely on), accessory dwelling units (ADUs), 2–4-unit properties, and smaller multifamily buildings.

# Housing Supply Action Plan

## 3. **Expand and improve existing forms of federal financing**, including for affordable multifamily development and preservation.

- Construction to Permanent loans (where one loan finances the construction but is also a long-term mortgage) more widely available by exploring the feasibility of Fannie Mae purchase of these loans;
- Promoting the use of state, local, and Tribal government COVID-19 recovery funds to expand affordable housing supply;
- **Reforms to the Low Income Housing Tax Credit (LIHTC) and the HOME Investment Partnerships Program (HOME).**



# Housing Supply Action Plan

4. **Ensure that more government-owned supply of homes and other housing goes to owners who will live in them – or non-profits who will rehab them – not large institutional investors.**
5. Work with the private sector to address supply chain challenges and improve building techniques to **finish construction in 2022 on the most new homes in any year since 2006.**

# Mixed Income Rental Housing Policy in the Housing Supply Action Plan

- Income averaging allows a developer to meet the same affordability goals by taking the average of the income for some households who are in the property as opposed to requiring all to meet the same threshold.
- This “average-income test” (AIT) for LIHTC qualification will enable the creation of more financially-stable, mixed-income developments and make LIHTC-supported housing more feasible in sparsely populated rural areas.
- It will also facilitate the production of additional affordable and available units for extremely low-income tenants.

# Department of Treasury, IRS

## LIHTC Average Income Test (AIT)

- One of the three affordability requirements available to developers in the AIT rule allows for LIHTC properties to be rented to people who earn up to 80% of AMI, as long as the average rent and income limit for “designated” units does not exceed 60% of AMI.
- Income averaging allows LIHTC developers to choose to serve households with incomes up to 80% of AMI, as long as **at least 40% of the units are both rent-restricted and occupied by households with incomes that do not exceed the “designated income limits,”** which may range from 20% of AMI in 10% increments up to 80% AMI.
  - The rent for a unit must not exceed 30% of the designated income limit – for example, 30% of 20% of AMI, 30% of 30% of AMI, etc.

Regulation will make it easier “to build mixed-income housing, housing that includes very low-income tenants, and housing in sparsely populated rural areas by reforming the income guidelines for [LIHTC].”

-Biden Administration

# Opportunity Zones

- Created in the 2017 Tax Cuts and Jobs Act.
- Intended to attract private capital to low-income areas through investment of unrealized capital gains
- Terminology
  - Qualified Opportunity Zones (QOZ) are designated census tracts eligible for tax incentives – at least one in every county in Florida
  - Qualified Opportunity Funds (QOF) are investment vehicles for property in an OZ.
- Some tax benefits ended in 2021, though most continue
- **No built-in affordability requirements**



# Parramore Oaks-Example of TC & OZ Investment

- Could potentially fill funding gaps
- Tax Credit investor also Opportunity Zone investor
- Unit Mix (110 units)
  - 96 affordable
  - 24 market-rate
- Capital Stack
  - First mortgage - \$5.6 million
  - HC and OZ equity - \$20.8 million
  - CRA - \$1.1 million
  - Deferred Developer Fee - \$500,000



Source: Economic Innovation Group 2019 Case Study:  
<https://eig.org/wp-content/uploads/2019/11/CaseStudy-Parramore.pdf>

# Infrastructure Surtaxes

**Discretionary Surtax – usually has a localized name for the program or more widely called a “penny sales tax” of “half-cent sales tax”**

- **“Any land acquisition expenditure for a residential housing project in which at least 30 percent of the units are affordable to individuals or families whose total annual household income does not exceed 120 percent of the area median income adjusted for household size, if the land is owned by a local government or by a special district that enters into a written agreement with the local government to provide such housing. The local government or special district may enter into a ground lease with a public or private person or entity for nominal or other consideration for the construction of the residential housing project on land acquired pursuant to this sub-subparagraph.” F.S. 212.055(2)(d)(1)(e)**





# Example: Pinellas County Penny IV Affordable Housing Program

- Land acquisition
- Capital improvements to support the development of affordable housing
  - Interpretation of F.S. 212.055(2)(d)(1)(e)
  - Makes the connection between affordable housing and economic development (workforce housing)
- Minimum of 10 Units
- Top Priorities
  - Mixed-income developments in target areas
    - 40% benefiting 60% AMI or below
    - 100% benefiting 80% AMI or below
    - Other shares benefiting up to 120% AMI based on need supported by data
  - Has approved entitlements and financing commitments
  - Supportive of economic development



# Example: Fairfield Apartments Revisited

- Income Mix
  - 53 units – up to 50% AMI
  - 67 units – between 50% and 80% AMI
  - 144 units – between 80% and 120% AMI
  - Proportionally mixed among all bedroom sizes
- Utilizing affordable housing density bonus
- Capital Stack
  - HUD 211(d)(4) – \$42,548,733
  - Pinellas County Penny IV - \$5,600,000
    - Land acquisition
  - City of St. Petersburg CRA - \$2,281,689
  - Owner's Equity – \$2,318,311



Photo source: [www.stpeterising.com](http://www.stpeterising.com)

# Example: Arya Apartments, St. Petersburg

- Located near major employment center
- Income Mix
  - 59 units – between 60% and 80% AMI
  - 66 units – between 81% and 120% AMI
  - 290 units – market rate
- Utilizing affordable housing density bonus
- Total development cost - \$97 million
- Pinellas County Penny IV funding - \$4 million (capital improvements funding)



Photo source: [www.stpeterising.com](http://www.stpeterising.com)





## *Monitoring & Compliance of Mixed- Income Housing*

Department of Housing and Community  
Development

Alfredo Duran  
Assistant Director, Housing



# Definitions



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Development**  
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## **Monitoring**

This is the act of periodic review of a development to ensure that it continues to meet promises made during the development process

## **Compliance**

The act of ensuring that mixed income developments meet specific performance parameters

Monitoring and Compliance, therefore, is the periodic review of developments to ensure that they adhere to specific performance parameters required during the development approval process.



Monitoring and Compliance program starts with Policies and Procedures

- **Policies and Procedures should include:**
  - A process for certifying affordable housing projects
  - A process for identifying all waivers and deferrals the project will be eligible for based on identified income limits during the certification process
  - Identification of the type of income limits and units and whether they are for fixed or floating units
  - The instrument that will allow for the monitoring of the development after completion should be identified.
  - At what point in the development process such document will be executed.
  - Identification of who approves the certification on behalf of the city.



# Who is Monitored?



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## **1. Developments Receiving Funding Assistance**

- A) HOME
- B) SHIP
- C) CDBG
- D) Other Federal/State funds
- E) Local Funding Programs

## **2. Developments Receiving Zoning Development Benefits (In exchange for affordable units)**

- A) Density Bonuses
- B) Impact fee deferral
- C) Parking reduction
- D) Other





# Why Monitor?



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1. Compliance with Federal, State, or local funding regulations/policies.
2. Compliance with project underwriting conditions. (# of units and AMI distribution)
3. Compliance with Zoning Code affordability requirements. (# of units and AMI distribution)
4. Compliance with Affordable Housing Certification

## **When to monitor?**

Depends on the funding source. Could be:

1. Annually ( recommended since most funding sources require it annually)
2. As determined by funding source (E.g. Physical inspection every 3 years for HOME program.)



## **Types of enforcement instruments used based on the complexity of the project**

1. Mortgages
2. Declarations of Restricted Covenants
3. Loan Agreement
4. Rent Regulatory Agreements
5. Deed Restrictions

## **For mixed-income (or low-income compliance in general) most common used instruments are:**

1. Declaration of Restricted Covenants
2. Rent Regulatory Agreements
3. Deed Restrictions



# Covenant



A covenant is a recorded instrument that ensures that the city can monitor mixed-income developments to ensure compliance of the affordable housing certification.

The covenant spells out the following:

- How many units and at what income levels will be restricted in the development
- How long will the units be restricted at the income levels identified
- How often will the units be monitored to ensure compliance with the terms of the covenant
- What are the procedures or process to bring non-compliant units to compliance?
- What are the ramifications of non-compliance?
- The covenant must be recorded to put the world on notice to such restrictions.



# Getting Started



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## **At least 120 days prior to the completion of the project:**

1. Is there an initial wait list? (How will this list be integrated with the Fair Housing Marketing Plan, FHMP, required)
2. Identify person or management company that will be conducting the income certification, execution of the leases, etc.?
3. Provide applicable income and rent standards to be used. ( Updated on an annual basis )
4. Provide Rent Regulatory Agreement (or other governing instrument)
5. Obtain copy of the proposed lease agreement with attachments
6. Discuss marketing commencement and advertisement requirements.



# Monitoring



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- Monitoring starts with a letter to the developer (or management company) about 30 days in advance that the development will be monitored to ensure that it is in compliance with the executed covenant/loan agreement. Etc.
- The initial letter includes a request for the rent roll of the development to include, names, unit numbers and current income levels.
- Provide a Monitoring Package that details the income certification process, documents to be collected and maintained in the tenant files
- A second letter sends the sample list and provides a time when the monitor will visit the property to review the physical file and schedule an HQS inspection on the assisted units.
- A random sample of the units are selected for an indebt review of the documents (sample is usually 10-20% of the units depending on the total number of units)



# Tenant Documents Reviewed



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- Income Certification Form
- Tenant applications
- Income back-up documentation Tax Returns, Award Letter, proof of identification, etc.
- Bank statements or Bank Account Declaration Affidavit
- Rent Assistance letter
- Lease with all addendums
- If the tenant is new, a copy of the application and identification of all household members (i.e. picture id, birth certificate, social security card)



# Other Documents Reviewed



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- Utility Allowance Source & Schedule
- Tenant Grievance Procedures
- Affirmative Marketing Report: A summary of the marketing done this past year; outreach efforts; include advertising/marketing materials (i.e., flyers, ads, etc.);
- Tenant Selection Procedures
- Rules and Regulations
- Tenant Participation Plan
- Waiting List/Wait list procedures





# After Review of Document



Department of  
**Housing  
& Community  
Development**  
City of Miami

- Determination of compliance or non-compliance
- Written communication to the Developer/Manager
- In the event of non-compliance, reasonable time is provided to cure.
- Continued non-compliance will result in the exercising of all rights under the law, (i.e. declare default under the loan documents or return of impact fees deferrals, etc.

# Questions



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THE FLORIDA HOUSING COALITION



# Upcoming Trainings

- **In-Person Training:**

- The Credit Underwriting Process for Affordable Housing
- Date: November 3<sup>rd</sup>
- Location: Tampa

- **Webinars:**

- Overcoming NIMBY Opposition (October 25<sup>th</sup>)
  - Using Publicly Owned Lands for Affordable Housing (November 1<sup>st</sup>)
  - Preparing for SHIP Monitoring Part 1 (November 8<sup>th</sup>)
- To Register, visit <https://flhousing.org/events/>

# Take the Survey



# Thank You For Attending!

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